

REMARKS

In the Office Action, pending claims 1-36 were rejected. The rejection of claims 1-36 is traversed, because the rejection is not supported by the art cited, as explained below.

Claims 1-3, 6-7, 9-11, 17-18, 21-23, 25, 29 and 31-36 were rejected under 35 USC 102(b) as anticipated by the Teague et al. reference, US Patent No.: 2,812,025. Claims 1-2, 5, 9-12, 18-20, 25, 29, 30, 35 and 36 were rejected under 35 USC 102(b) as anticipated by the Swift reference, US Patent No.: 3,353,599. Claims 1-3, 6-7, 9-11, 17-18, 21-23, 25, 29 and 31-36 were rejected under 35 USC 102(b) as anticipated by the Lebourg reference, US Patent No.: 3,419,080. Each of these rejections is respectfully traversed.

Applicants respectfully submit the Examiner has misinterpreted the teachings of the cited references in light of the recitations of the rejected claims. For example, in citing the Teague et al. reference, the Examiner states that pipe string 16 is used with removable setting tool 18 "taken as the called for insertion guide" to install expansible liner 14. Similarly, the Swift reference is relied on as disclosing a setting tool 34 which serves as the "called for insertion guide." Again, with respect to the Lebourg reference, the Examiner states that the reference "discloses the use of an expandable liner 13 made of an impermeable yet elastic material (see column 2, line 37) set with setting tool 14 and used in a completion to isolate formation 11, the setting tool being retrievable after expanding liner 13 (see Fig. 4) which serves as the insertion guide as called for in claims 1-3 so as to inhibit axial flow from the formation 11 about the liner as called for in claim 6, the elastic member serving as the swelling material called for in claim 8, the liner 13 serving as in Fig. 4 as the completion component...." Thus, the Examiner is equating some type of setting tool disclosed in each of these references with the "insertion guide" recited in each of the pending independent claims. However, this characterization of a "setting tool" as being anticipatory of the claimed "insertion guide" is completely wrong.

As described and illustrated throughout the present application, the "insertion guide" is an expandable, generally tubular member. The guide is moved to a desired location, such as within a wellbore, and sufficiently expanded toward the surrounding wellbore wall to receive a

completion. Contrariwise, the setting tools described in the cited references are merely fixtures utilized in moving a tubing segment to downhole positions. The setting tools do not serve as the claimed insertion guides for guiding the insertion of a completion or completion component that functions within the insertion guide.

Specifically, the references relied on by the Examiner fail to disclose various features and combinations of features recited in the currently pending claims. For example, the references fail to disclose an "insertion guide" that is "radially expanded at least partially against the formation" in combination with a "completion component deployed within the insertion guide" as recited in independent claim 1. Similarly, the references fail to disclose the method of deploying an "insertion guide" within a wellbore and "expanding the insertion guide" to enable the insertion of a "completion into the insertion guide" as recited in independent claim 18. The references also fail to disclose the method recited in independent claim 27 which calls for "locating an insertion guide" in a wellbore, "expanding the insertion guide" to reduce the surrounding annular space, and "utilizing a completion within the insertion guide." Again, with respect to independent claim 36, the cited references fail to disclose the recited means for "deploying an insertion guide... expanding the insertion guide..." and "introducing a completion into the insertion guide." Claims 2-17, 19-26 and 28-35 depend from independent claims 1, 18 and 27, respectively, and are patentable for the reasons provided above with respect to the independent claims as well as for the unique subject matter recited in each dependent claim.

Claims 13-16 and 26 were rejected under 35 USC 103(a) as unpatentable over the Teague et al. reference, Swift reference or Lebourg reference and further in view of the Terry et al. reference, US Patent No.: 6,296,066. This rejection is respectfully traversed for the reasons cited above in relation to the three primary references. Applicants believe the teachings of those references do not correspond to the recited subject matter of the pending independent claims from which claims 13-16 and 26 depend. Furthermore, the Terry et al. reference does not provide any additional disclosure or teaching that would obviate the deficiencies of the primary references relied on by the Examiner.

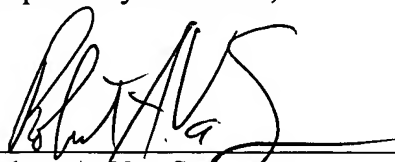
Claim 4 was rejected under 35 USC 103(a) as unpatentable over the Teague et al. reference, Swift reference or Lebourg reference and further in view of the Stone reference, US Patent No.: 4,266,606, or the Mohn reference, US Patent No.: 5,060,737. This rejection is respectfully traversed. Claim 4 depends from independent claim 1 and is patentable for the reasons provided above with respect to independent claim 1. The Stone and Mohn references add nothing that would obviate the deficiencies of disclosure in the primary references.

Claims 24 and 28 were rejected under 35 USC 103(a) as unpatentable over the Teague et al. reference, Swift reference or Lebourg reference and further in view of the Cook reference. This rejection is respectfully traversed. Claims 24 and 28 depend from independent claim 18 and are patentable for the reasons provided above with respect to independent claim 18. The Cook reference adds nothing that would obviate the deficiencies of disclosure in the primary references. Accordingly, claims 4, 13-16, 24, 26 and 28 are patently distinguishable over the cited references.

Applicants hereby petition to extend the period for response by one month, from August 15, 2003 to September 15, 2003. The enclosed payment includes the fee associated with this extension in the amount of \$110.00 in accordance with 37 C.F.R. § 1.136.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. A. Van Someren', written over a horizontal line.

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